

# **EXHIBIT 3;**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

**DECLARATION OF JAMES C. GRANT**

I, James C. Grant, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am over the age of 18, have knowledge of the matters set forth herein, and could testify competently to them if called as a witness.
2. I am presently employed by Universal Protection Service, LP d/b/a Allied Universal Security Services (“Allied Universal”) and serve as the Director, Weapons & Use of Force Policy. I have held this position continuously since November 2, 2012. In my capacity, I am responsible for overseeing the implementation of, and compliance with, Allied Universal’s Use of Force (“UOF”) Policy. I have full access to all UOF Incident Reports that have been submitted.
3. Based on my review and search of Allied Universal’s UOF Incident Reports, I was unable to locate any UOF Incident Report for a security professional named Raymond Rodriguez who allegedly deployed a taser on a subject at a H-E-B store in Houston, Texas.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and under the laws of the United States of America, that the foregoing is true and correct, except as to matters stated to be based on information and belief.

FURTHER DECLARANT SAYETH NOT.

Executed on November 19, 2024.

  
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James C. Grant  
Director, Weapons & Use of Force Policy  
Universal Protection Service, LP d/b/a Allied  
Universal Security Services